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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

GERARDO ACEVES, THOMAS FAN,) Case No.: 3:24-cv-02663-MMC
EDWIN MARTINEZ, TIFFANY SMOOT,)
EDOUARD CORDI, and BRETT MAGGARD,)
Individually, and on Behalf of All Others)
Similarly Situated,) **CLASS ACTION**
Plaintiffs,)
)
v.) **STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEFENDANTS'
TIME TO RESPOND TO THE
COMPLAINT**
COINBASE GLOBAL, INC., COINBASE,)
INC., COINBASE ASSET MANAGEMENT,)
LLC, and BRIAN ARMSTRONG,)
Defendants.) Honorable Maxine M. Chesney
)

1 Pursuant to Rules 6-2 and 7-12 of the Northern District of California Civil Local Rules
 2 (“Civil Local Rule”), plaintiffs Gerardo Aceves, Thomas Fan, Edwin Martinez, Tiffany Smoot,
 3 Edouard Cordi, and Brett Maggard, individually and on behalf of all others similarly situated
 4 (“Plaintiffs”), along with Defendants Coinbase Global, Inc., Coinbase, Inc., Coinbase Asset
 5 Management, LLC, and Brian Armstrong (“Defendants”, and Defendants together with Plaintiffs,
 6 the “Parties”), hereby agree and stipulate subject to the terms below that good cause exists to request
 7 an order from the Court extending the deadline for Defendants to respond to the complaint filed by
 8 Plaintiffs on May 3, 2024 (the “Aceves Complaint”).

9 A. On July 9, 2024, Defendants filed an administrative motion to consider whether this
 10 matter and *Carter v. Coinbase Global, Inc., et al.*, No. 3:24-cv-03350-CRB (the “*Carter Action*”,
 11 and together with this Action, the “Actions”) are related. *See* ECF No. 13. The Parties also filed a
 12 stipulation signed by all Parties as well as the plaintiffs in the *Carter Action* requesting that the
 13 Actions be deemed related. *See* ECF No. 13.1. The Court granted this motion on July 11, 2024. *See*
 14 ECF No. 14.

15 B. On July 9, 2024, the Parties met and conferred with the plaintiffs in the *Carter Action*
 16 about potential consolidation of the Actions and for Defendants to respond to the *Aceves Complaint*.

17 C. The plaintiffs in both Actions currently anticipate that they will move to consolidate
 18 the Actions and work with Defendants to agree to a schedule by which the Plaintiffs will file a
 19 consolidated complaint.

20 NOW, THEREFORE, the Parties, subject to approval of the Court, hereby stipulate and agree
 21 as follows:

22 1. Plaintiffs intend to file an amended consolidated complaint following the
 23 consolidation of the Actions, if approved by the Court.

24 2. The Parties will meet and confer within five (5) business days after the Actions are
 25 consolidated to discuss a schedule going forward, including the filing of an amended consolidated
 26 complaint and any answer to that complaint by Defendants.

1 3. Pursuant to Civil Local Rule 6-2, Defendants are excused from the obligation to
2 answer, move to dismiss or otherwise respond to the *Aceves* Complaint prior to the filing of an
3 amended consolidated complaint. All other deadlines will be extended accordingly.

4 4. If the Actions are not consolidated, the Parties shall meet and confer within five (5)
5 business days of any order denying consolidation to discuss a schedule going forward.

6 5. The Parties expressly preserve all other rights and defenses.

7 IT IS SO STIPULATED.

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1 Dated: July 11, 2024

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17 *Attorneys for Plaintiffs*
18 *Admission pro hac vice application
forthcoming

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1 **Attestation Pursuant to Local Rule 5-1(i)(3)**

2 Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
3 document has been obtained from each of the other signatories.

4 DATED: July 11, 2024

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6 By: /s/ Mark R. S. Foster
7 Mark R.S. Foster

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1 [PROPOSED] ORDER
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3 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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5 DATED: _____
6 _____
7 HONORABLE MAXINE M. CHESNEY
8 UNITED STATES DISTRICT JUDGE
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